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*Attorney for Nicholas J. Santoro and Juanita Santoro,
 Trustees of the Nicholas J. and Juanita Santoro
 Family Trust*

**UNITED STATES BANKRUPTCY COURT
 DISTRICT OF NEVADA**

In re:

Case No.: 06-10725-LBR
 Chapter 11

USA COMMERCIAL MORTGAGE
 COMPANY,

Debtor.

**NICHOLAS J. SANTORO'S MOTION
 FOR PERMISSION TO FILE IN PAPER
 FORMAT DUE TO EXEMPTION OR
 EXCEPTIONAL CIRCUMSTANCES**

Date of Hearing: N/A
 Time of Hearing: N/A

Pursuant to Administrative Order 04-3 (the "Order"), movant Nicholas J. Santoro, Esq., hereby requests permission to file documents in traditional paper format on the grounds that:

****Movant is not a "Regular Filer" as defined in the Order; and**

****Exceptional circumstances exist which prevent filing by electronic means.**

1. Document

The documents which the movant seeks permission to file in paper format are:

A. NOTICE OF APPEARANCE, REQUEST FOR SPECIAL NOTICE AND DEMAND FOR COPIES OF ALL FILED PLANS AND DISCLOSURE STATEMENTS;

B. JOINDER OF NICHOLAS J. SANTORO IN SUPPORT OF PARTIAL OPPOSITION TO "DEBTORS' PROPOSED CASH MANAGEMENT PROCEDURES AND INTERIM USE OF CASH IN ACCORDANCE WITH PROPOSED CASH BUDGET."

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2. Exceptional Circumstances

If permission to file in paper format is sought on the basis of exceptional circumstances, the movant states the following as grounds for the Motion:

(a) Internet service problems - N/A

(b) Other grounds exist for the Exceptional Circumstances Motion. Each of Debtor's motions opposed by movant are being heard on a shortened-time basis May 3, 2006. Movant has not had time to engage counsel or otherwise receive the necessary e-filing training in time for the hearing. Movant anticipates engaging counsel shortly after the May 3 hearings, or otherwise will fulfill the e-filing training requirements to continue representing the Trust.

(c) Movant has filed a prior Exceptional Circumstances Motion

(i) Number of prior motion(s): 0

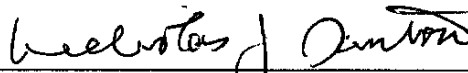
(ii, iii, and iv) N/A

3. Movant's declaration supporting this Motion is attached pursuant to Section 3(b)(i) of the Order.

4. Movant hereby also submits a proposed order pursuant to the Order.

Based upon the foregoing, movant requests that the Court grant the Motion.

Dated this 1 day of May, 2006.



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